

NOTED  
FILED  
JUN 11 2001  
CLARENCE MADDOX  
CLERK, USDC / SDFL / FTL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

CASE NO. 00-6360-CR-DIMITROULEAS

UNITED STATES OF AMERICA.

vs.

ADRIANO MARTINEZ,

Defendant.

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**MOTION TO EXTEND THE TIME FOR FILING THE  
OBJECTIONS TO THE PRE-SENTENCE INVESTIGATION REPORT**

**COMES NOW** the Defendant, ADRIANO MARTINEZ, by and through undersigned counsel and respectfully requests this Honorable Court grant this motion and would allege as follows:

1. The Defendant, ADRIANO MARTINEZ, was arrested on December 22<sup>nd</sup>, 2000 and charged with receiving and possessing stolen goods and chattels of a value in excess of \$1,000 which were part of an interstate shipment of freight, in violation of 18 U.S.C. § 659.

2. The Defendant, ADRIANO MARTINEZ, entered into a plea of guilty on April 20<sup>th</sup>, 2001 to the aforementioned charges.

3. The Pre-Sentence Investigation Report was received on May 31<sup>st</sup>, 2001, the objections shall be filed by June 8<sup>th</sup>, 2001 and the sentencing in this cause is scheduled for June 29<sup>th</sup>, 2001.

4. The Pre-Sentence Investigation Report raises significant issues which are in direct conflict with the Plea Agreement.

5. Counsel needs additional time to research these issues, prepare a memorandum, and file the objections.

6. Counsel has had a very busy trial schedule and needs some additional time.

7. The sentencing is not until June 29<sup>th</sup> and the government or probation would not be prejudice by the defendant having this additional time.

8. Counsel has contacted Assistant United States Attorney Don Chase and he has advised he has no objection to this motion.

9. This motion is made in good faith and not for any purpose for delay.

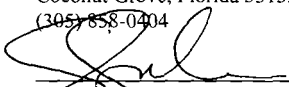
**WHEREFORE**, the Defendant, ADRIANO MARTINEZ, respectfully requests this Honorable Court grant this motion and extend the time for filing objections for at least ten days (June 18<sup>th</sup>, 2001), ten days prior to the date of sentencing.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct of the foregoing was forwarded to Assistant United States Attorney Donald Chase, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301 on this 8<sup>th</sup> day of June, 2001.

Respectfully submitted,

STEPHEN J. GOLEMBE, ESQUIRE  
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